

**United States Bankruptcy Court
Middle District of Pennsylvania**

In re:

Anthony J. Oliveri and Debra Lynn
Oliveri,

Debtors.

Case No. 5:23-bk-02286-MJC

Chapter 13

Related to ECF No. 28

**Debtor's Objection to Motion for Relief from Stay filed by Citizens Bank,
N.A.**

AND NOW, Debtors Anthony J. Oliveri and Debra Lynn Oliveri, by and through their attorney, hereby objects to the Motion for Relief from Stay filed by Citizens Bank, N.A.. Because the purported arrearage that gave rise to the Motion can be timely paid directly or through the chapter 13 plan, no grounds for relief exist and the Motion must be denied.

NOW, THEREFORE, the Debtor asks this Court to deny the Motion in the form of order attached and to grant such other and further relief in their favor as may be necessary and proper under the law.

Date: January 17, 2024

CIBIK LAW, P.C.
Counsel for Debtor

By: /s/ Michael A. Cibik
Michael A. Cibik (#23110)
1500 Walnut Street, Suite 900
Philadelphia, PA 19102
215-735-1060
mail@cibiklaw.com

Certificate of Service

I certify that on this date I caused a true and correct copy of the Debtor's Objection to Motion for Relief from Stay filed by Citizens Bank, N.A. to be served on all parties on the clerk's service list through the CM/ECF system.

Date: January 17, 2024

/s/ Michael A. Cibik
Michael A. Cibik

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re:

Anthony J. Oliveri and Debra Lynn
Oliveri,

Debtors.

Case No. 5:23-bk-02286-MJC

Chapter 13

Related to ECF No. 28

Order Denying Motion for Relief from Stay filed by Citizens Bank, N.A.

AND NOW, upon consideration of the Motion for Relief from Stay filed by Citizens Bank, N.A., and the Debtor's objection thereto, and after notice and hearing, it is hereby **ORDERED** that the Motion is **DENIED**.